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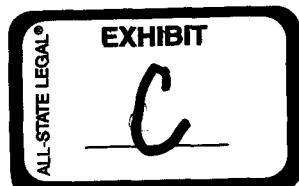
September 23, 2012

Collin Cobb
Attorney At Law
Harris Duesler and Hatfield LLP
550 Fannin, Ste. 650
Beaumont, Texas 77701

Dear Scott L. Mullins,

I am filing this complaint against David F. Villacres, M.D. and Kingscrossing Rehabilitation Therapy in Kingwood, TX. Also including, Dr. Minir Shaw of The Woodlands Sports Medicine who specializes in hand surgery and orthopedics. Dr. Gustavo Grieco who practices as a cardiologist with Red Oak Cardiovascular Center. Which is located next door to One Step Imaging. In addition to the previous mentioned doctors Dr. Metzger, Dr. Triffiro and others practicing and associated with Concentra - a Workers Compensation group. These physicians are involved with Stark Law violations and fee splitting.

I was an employee hired directly by Dr. Villacres and worked at his facility, Kingscrossing Rehabilitation Therapy from March 2010 - November 2010. The following is what I observed first hand while working for Dr Villacres at his facility, Kingscrossing Rehabilitation Therapy. My job was to schedule EMG studies for Dr. Villacres and the above listed doctors that were preformed at One Step Imaging, a free standing imaging center located 22 miles from Dr. Villacres office. Which caused patients to drive further distances with at least four or five imaging facilities in between including two local hospitals. Dr. Villacres had an arrangement with a partner of One Step Imaging (Rahul, who performs business as NSTZ Consulting). Dr Villacres and the partner would pay a gentleman, Dr. Desai who is a PhD in Education (which is misleading to the general public) to perform the EMG studies at One Step Imaging, without the supervision of a medical Dr. The information-reports were emailed to Dr. Villacres for interpretation. Dr. Villacres would bill insurance under his NPI number and then give the partner 50% of the monies and the referring physicians would also be paid for referring the patient for the exam. The mixture of patients included private insurance, Medicare and Medicaid, HMO, PPO,



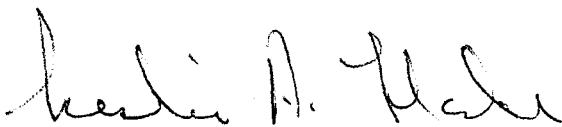
and Workers Compensation cases. The patient referrals from Dr. Villacres included EMG and MRI studies.

At the end of each month Rahul from One Step Imaging would stop by Dr Villacres office to collect a check from Dr. Villacres for the 50% of insurance payments. I have personally seen a check written from Dr. Villacres given to Rahul. In the memo line of this check is written something to the effect of " payment for EMG's"

At the end of the month Dr. Villacres had his receptionist and myself run spreadsheets listing; the patient' name, the date of the procedure, the amount insurance paid, the referring Dr. and any miscellaneous notes. The notes often list the type of insurance billed. These spreadsheets also contain notes as to the calculations of the fees owed One Step Imaging. Copies of the spreadsheets dated March 2011- January 2011, which I have provided to you, Collin Cobb with Duesler and Hatfield LLP of Beaumont, Texas.

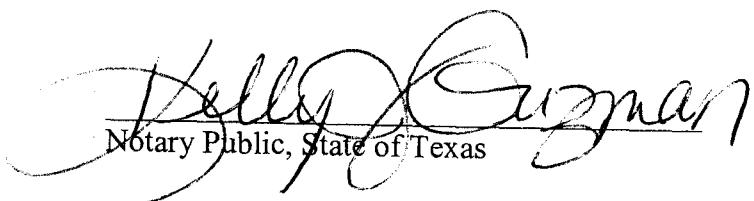
While employed by Dr. Villacres I had questioned him about his practice of Stark Law violation and fee splitting being illegal. He assured me it wasn't.

Please feel free to contact me with any questions.



Leslie A. Flake CMA(AAMA)

SUBSCRIBED AND SWORN TO BEFORE me by Leslie A. Flake, on this 23rd day of
September, 2012.



Kelly J. Guzman
Notary Public, State of Texas

